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June 7, 2021

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
Manhattan, New York

Re: *United States v. Otto Salguero Morales*, S5 15 Cr. 379

Dear Judge Castel,

There is currently pending before this Court a motion from my client Otto Salguero Morales, to reassign this case. The Government filed an Opposition pleading on May 28, 2021. By Minute Order dated June 3, 2021, the Court gave the defense until June 9, 2021 to file a reply memorandum. *See* DE 343. I am respectfully asking this Court for additional time to submit the reply memorandum until Monday, June 14, 2021. I have consulted with the prosecutors in this case, who do not oppose the request for additional time.

The reason for this request is that I was advised on June 4, 2021 that I would need to travel outside of the United States to attend a “proffer session” between a client and United States law enforcement agents from Monday June 7 though Wednesday June 9, 2021. The timing of the meeting was beyond my control and I requesting the additional time to file the reply memorandum in order to fulfill my professional responsibility to Mr. Salguero Morales.

There is currently no date for oral argument on the pending Motion For Case Reassignment. The next scheduled appearance for Otto Salguero Morales is June 23, 2021 to conduct a *Curcio* hearing in this case. There is a joint status hearing scheduled for July 7, 2021.

Thank you for consideration of this matter.

Respectfully submitted

*Robert Feitel*

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